

REMARKS

Favorable reconsideration of the present application is respectfully requested. Claims 1–20 are currently pending. Claims 1-20 have been previously amended.

Claims 1, 2, 4, 8-11, 13-16, 19 and 10 are rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,598,451 to Blue (hereinafter “Blue”) in view of U.S. Patent No. 3,577,753 to Shah (hereinafter “Shah”). Applicant respectfully traverses the rejection. Blue discloses three die modules, each of which includes a die nib that is held in a die case (*see*, Column 2, Lines 19-27). Figure 1 of Blue discloses that die cases 15, 17, 19, 21 and 23 hold die nibs 14, 16, 18, 20 and 22, respectively (*see also*, Column 2, Lines 24-27), and one face of each die case forms a part of the bore of the apparatus. Contrary to the Examiner’s assertion, this does **not** mean that the die cases “open into a bore of the apparatus” (*see*, Office Action, Page 2, Second paragraph, Lines 6-7). In fact, there is no opening shown or described in Blue that would allow the passage of cooling medium into the bore from the die module. In addition, Blue does not disclose or suggest that the cooling medium is supplied anywhere other than through the die module inlet ports to the die nibs via the channels or that the cooling medium exits anywhere apart from the outlet ports (*see*, Blue, Column 2, Lines 28-32). Therefore, to effectuate cooling of the die nibs in Blue, the cooling medium directly contacts each die nib via channels 42, 44, 46, 48 and 50 formed in outer walls of die nibs 14, 16, 18, 20 and 22, respectively (*see, Id*, Lines 44-47). However, allowing the cooling medium to directly contact each die nib is contrary to the “at least one coolant die (3,4,5,6) adjacent the at least one ironing die and having an internal cooling cavity (8) for circulating coolant only within the coolant die adjacent the ironing insert (12) of the ironing die (1,2),” as recited in Claim 1 (emphasis added by Applicant). Accordingly, Blue fails to disclose or suggest “at least one coolant die (3,4,5,6) adjacent the at least one ironing

die and having an internal cooling cavity (8) for circulating coolant only within the coolant die adjacent the ironing insert (12) of the ironing die (1,2),” as recited in Claim 1.

As the Examiner admits, “Shah teaches (column 2, lines 22-32) that it is known to supply coolant between a die case (22,18) and dies (16,17) so as to provide coolant at a position adjacent the die (16,17) to circulate the coolant around the die.” (*See*, Office Action, Page 2, Second paragraph, Lines 12-15.) Similar to Blue, Shah discloses that the coolant directly contacts each die (16,17) via grooves 27 in order to cool the die (*see*, Blue, FIG. 1, and Column 2, Lines 22-32). However, as noted above in regards to Blue, having grooves that allow the cooling medium to directly contact each die nib is contrary to the “at least one coolant die (3,4,5,6) adjacent the at least one ironing die and having an internal cooling cavity (8) for circulating coolant only within the coolant die adjacent the ironing insert (12) of the ironing die (1,2),” as recited in Claim 1. As a result, Blue and Shah, either individually or in combination, fail to teach or suggest “at least one coolant die (3,4,5,6) adjacent the at least one ironing die and having an internal cooling cavity (8) for circulating coolant only within the coolant die adjacent the ironing insert (12) of the ironing die (1,2),” as recited in Claim 1. Therefore, Claim 1, and Claims 2, 4, 8-11, 13-16, 19 and 20 that depend therefrom, are patentably distinguishable over Blue and Shah and are believed to be allowable. Accordingly, the Section 103 rejection of Claim 1, and Claims 2, 4, 8-11, 13-16, 19 and 20 that depend therefrom, is believed to be overcome and the Examiner is respectfully requested to formally withdraw the rejection.

Claims 3, 5-7, 12, 17 and 18 are variously rejected under 35 U.S.C. 103(a) as being anticipated by Blue in view of Shah and further in view of United States Patent Number 6,776,021 to Scholey (hereinafter “Scholey”) or further in view of United States Patent Number 4,223,544 to Main (hereinafter “Main”) or further in view of United States Patent

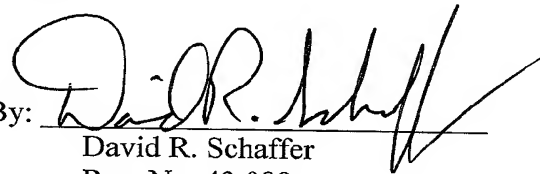
Number 5,692,409 to Cheers (hereinafter "Cheers"). Scholey, Main and Cheers all fail to make up for the deficiencies in Blue and Shah. Therefore, for at least those reasons given above for Claim 1, the Section 103 rejections of Claims 3, 5-7, 12, 17 and 18 are also believed to be overcome and the Examiner is respectfully requested to formally withdraw the Section 103 rejections of Claims 3, 5-7, 12, 17 and 18 and issue a Notice of Allowance for Claims 1-20.

Should the Examiner believe that any further action is necessary to place this application in better form for allowance, the Examiner is invited to contact Applicants' representative at the telephone number listed below.

The Commissioner is hereby authorized to charge to Deposit Account No. 50-1165 (T4515-16172US01) any fees under 37 C.F.R. §§ 1.16 and 1.17 that may be required by this paper and to credit any overpayment to that Account. If any extension of time is required in connection with the filing of this paper and has not been separately requested, such extension is hereby requested.

Respectfully submitted,

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